

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

NATHANIEL CLARK,)	
)	
Plaintiff,)	CIVIL ACTION FILE NO.:
)	1:22-CV-02748-CAP-RDC
v.)	
)	
CITY OF FOREST PARK, GA;)	
LATRESA AKINS-WELLS, <i>in her</i>)	
<i>individual capacity</i>)	
)	
Defendants.)	

**CONSENT MOTION FOR EXTENSION OF TIME FOR DEFENDANT CITY
OF FOREST PARK TO FILE ITS REPLY IN SUPPORT OF ITS MOTION
TO DISMISS PLAINTIFF’S SECOND AMENDED COMPLAINT**

COMES NOW the City of Forest Park, Georgia (the “City”), with the consent of Plaintiff Nathaniel Clark, by and through the undersigned counsel of record, hereby move this Court to extend the time for the City to file its Reply in Support of its Motion to Dismiss Plaintiff’s Second Amended Complaint. In support of this motion, the City shows this Court as follows:

1.

Defendant City of Forest Park filed a Motion to Dismiss Plaintiff’s Second Amended Complaint against the City on July 20, 2022. (Doc. 8).

2.

Plaintiff filed a response brief to Defendant's motion on August on August 3, 2022. (Doc. 12).

3.

The City's reply brief is currently due on August 17, 2022. However, the undersigned defense counsel requests a brief extension of seven (7) days to file its reply up to and including August 24, 2022 in order to recover from a temporary illness.

4.

Plaintiff, through his counsel, consents to this extension.

5.

No previous extensions have been sought or granted. The Court has the authority for good cause to extend the City's time to Reply pursuant to Fed. R. Civ. P. 6(b)(1)(A).

Accordingly, the City respectfully requests that the Court extend the City's time to file its Reply to Plaintiff's Response to the City's Motion to Dismiss Plaintiff's Second Amended Complaint.

Respectfully submitted,

FREEMAN MATHIS & GARY, LLP

/s/ Shaheem M. Williams

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Counsel for City of Forest Park, GA

CERTIFICATE OF COMPLIANCE

I hereby certify, pursuant to Local Rule 7.1(D), that the foregoing motion has been prepared in accordance with Local Rule 5.1(C) (Times New Roman font, 14 point).

This 15th day of August, 2022.

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